

1 Julie S. Turner (SBN 191146)
2 TURNER BOYD LLP
2570 W. El Camino Real
Suite 380
3 Mountain View, CA 94040
Phone: (650) 521-5930
4 Facsimile: (650) 521-5931
Email: turner@turnerboyd.com

5 *Attorneys for*
6 *Netfirms.com, Inc.*

7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **WESTERN DIVISION – ROYBAL FEDERAL BUILDING**

11
12 ANTHONY N. CHAI,

13 Plaintiff,

14 v.

15 NETFIRMS.COM, INC., *et al.*,

16 Defendants.

17 CASE No. CV11-06988-GHK (CWx)

18
19 **DECLARATION OF JULIE S.
TURNER IN SUPPORT OF
NETFIRM.COM, INC.'S *EX
PARTE* APPLICATION FOR
ORDER GRANTING LEAVE TO
FILE SUR-SUR-REPLY**

20
21 Date: February 6, 2012 [vacated]
22 Time: 9:30 a.m.
23 Judge: The Hon. George H. King
24 Crtrm: 650

I, Julie S. Turner, declare:

1. I am a partner with the law firm of Turner Boyd LLP, which represents Defendant Netfirms.com, Inc. in the instant lawsuit.

2. I make this declaration of my own personal knowledge. If called to testify, I could and would do so competently.

3. On February 6, 2012, at approximately 7:35 p.m., my law firm's email system received service of Plaintiff Anthony Chai's Ex Parte Application For Order Granting Leave To File Sur-Reply and the supporting documents, through the Court's ECF system.

4. On February 7, 2012, at approximately 2:30 p.m., I sent an email to Mary-Christine Sungaila and Allison Lefrak, counsel for Plaintiff, informing them that Netfirms would be filing its application for an order granting it leave to file a sur-sur-reply, in the event that the Court were inclined to grant Plaintiff's application for leave to file his sur-reply.

5. On February 7, 2012, at approximately 2:35 p.m., I conveyed the same information directly to Allison Lefrak by telephone. Ms. Lefrak indicated that Plaintiff would likely oppose Netfirms' application.

6. On February 7, 2012, at approximately 2:38 p.m., I received an email from Ms. Sungaila acknowledging receipt of my email to her and also indicating that Plaintiff would likely oppose Netfirms' application.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: February 7, 2012

TURNER BOYD LLP

By: /s/ Julie S. Turner
Julie S. Turner

*Attorneys for Defendant
Netfirms.com, Inc.*

TURNER BOYD LLP
2570 W. El Camino Real, Suite 380
Mountain View, CA 94040

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27